

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-10 and 16-20 have been canceled. Claims 11-15 are pending, of which claims 11-15 have been amended. The amendments to
5 claims 11-15 are simply to provide clarification and to correct informalities noted by the Applicant, and are not to overcome prior art.

Drawing / Specification Objection

The drawings are objected to because they include reference numbers not
10 mentioned in the description (*Office Action* p.2). The specification amendments provided herein add reference number 15 (Fig. 1) and reference number 114 (Fig. 4) to the description. Additionally, a new set of formal drawings (replacement sheets 1-4) have been included herewith. The drawings have been updated to correct informalities (e.g., line weight, text, readability, etc.), but
15 otherwise remain unchanged.

Accordingly, Applicant respectfully requests that the drawing and specification objection be withdrawn.

Claim Objections

20 Claims 1 and 11 are objected to for a misspelled word. Claim 1 has been canceled and an appropriate correction to claim 11 has been provided herein. Applicant respectfully requests that the claim objections be withdrawn.

35 U.S.C. §102 Claim Rejections

Claims 1-3, 6-10, 16-17, and 19-20 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,937,225 to Samuels (hereinafter, "Samuels") (*Office Action* p.2). These claims have been canceled and
5 Applicant respectfully requests that the §102 rejection be withdrawn.

35 U.S.C. §103 Claim Rejections

Claim 4 is rejected under 35 U.S.C. §103(a) for obviousness over Samuels (*Office Action* p.5). Claim 4 has been canceled.

10 Claims 5, 11-15, and 18 are rejected under 35 U.S.C. §103(a) for obviousness over Samuels in view of U.S. Patent No. 5,825,986 to Ferguson (hereinafter, "Ferguson") (*Office Action* p.6). Claims 5 and 18 have been canceled. Applicant respectfully traverses the rejection of claims 11-15.

Claim 11 recites:

In a computer network including a host computer, a print server and at least one image-forming device that utilizes a marking material to create
5 images on a print media, a method for calculating an amount of the marking material for a print job, the method comprising:

converting the print job to a universal format file;
transmitting the universal format file to a print server;
10 copying the universal format file to generate a copied file; and

as a first task:

converting the universal format file to a page description
language (PDL) file;

15 processing the PDL file including at least selecting an image-forming device for the print job;

transmitting the PDL file to the selected image-forming device to print the print job; and

20 as a second task, separate from the first task:

converting the copied file of the universal format file to raster data;

counting the number of image elements corresponding to the print job contained in the raster data; and

25 calculating the amount of the marking material for the print job based on a predetermined amount of marking material for printing an individual image element.

Samuels and/or Ferguson do not teach *both* “converting the universal
30 format file to a page description language (PDL) file” which is transmitted to an image-forming device to print the print job *and* “converting the copied file of the universal format file to raster data” to calculate the amount of marking material for the print job, as recited in claim 11.

The Office recognizes that Samuels does not disclose converting a
35 universal format file to a PDL file (*Office Action* p.6). Samuels describes that a formatting entity generates a printer specific stream of bits which is sent to a printer spooler, and which is sent to an entity that translates the stream of bits into a pixel count (*Samuels* col.3, lines 35-40). Contrary to converting a

universal format file to a PDL file for printing and to raster data to calculate the marking material, as recited in claim 11, Samuels utilizes the same stream of bits to both print and determine a pixel count.

The Office cites Ferguson for encoding an image in PDL for output to a printer (*Ferguson* col.3, line 66 – col.4, line 1) (*Office Action* p.6). However, there is no motivation to combine Ferguson with Samuels, other than to select various features of references in an effort to substantiate the §103 rejection. There is no indication provided, or reason, for the formatting entity in Samuels to generate the printer specific stream of bits as an encoded PDL output or in any other format other than the stream of bits, particularly when the second entity in Samuels utilizes the same stream of bits to determine a pixel count.

Accordingly, claim 11 along with dependent claims 12-15 are allowable over the Samuels-Ferguson combination and Applicant respectfully requests that the §103 rejection be withdrawn.

Conclusion

Pending claims 11-15 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. If any issues remain that preclude issuance of this application, the Examiner is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

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